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18 UNITED STATES DISTRICT COURT

19 DISTRICT OF NEVADA

20 Cung Le, Nathan Quarry, Jon Fitch, Brandon
21 Vera, Luis Javier Vazquez, and Kyle
22 Kingsbury on behalf of themselves and all
others similarly situated,

23 Plaintiffs,

24 v.

25 Zuffa, LLC, d/b/a Ultimate Fighting
26 Championship and UFC,

27 Defendant.
28

Case No.: 2:15-cv-01045-RFB-(PAL)

**JOINT MOTION TO SEAL
PLAINTIFFS' OPPOSITION TO
ZUFFA, LLC'S MOTION TO
SEAL ZUFFA, LLC'S MOTION
FOR SUMMARY JUDGMENT
(ECF NO. 581)**

1 When Defendant Zuffa, LLC (“Zuffa”) filed its Motion for Summary Judgment on July
2 30, 2018 (ECF No. 573), it concurrently filed a Motion to Seal Zuffa, LLC’s Motion for
3 Summary Judgment and Related Materials (ECF No. 577) (the “Motion to Seal”). On August 13,
4 2018, Plaintiffs filed their Opposition to Defendant Zuffa, LLC’s Motion to Seal Zuffa, LLC’s
5 Motion for Summary Judgment and Related Materials (ECF No. 577) (the “Opposition”). The
6 Motion for Summary Judgment and the Opposition refer to documents that Zuffa has designated
7 Confidential or Highly Confidential (the “Disputed Materials”) pursuant to the Revised
8 Stipulation and Protective Order issued by this Court on February 10, 2016 (ECF No. 217) (the
9 “Protective Order”). In its Motion to Seal, Zuffa asserted that the Disputed Materials are properly
10 sealed under the compelling reasons standard. As stated in Plaintiffs’ Opposition, Plaintiffs do
11 not believe Zuffa’s confidentiality designations meet the compelling reasons standard, and oppose
12 sealing the Disputed Materials for that reason. However, solely for the limited reason that the
13 documents, as they currently stand, are still designated Confidential or Highly Confidential,
14 Plaintiffs do not oppose Zuffa’s request in this joint motion that the documents—and references
15 to them in Plaintiffs’ Opposition—remain under seal, in accordance with the Protective Order,
16 until the Court has ruled on whether Zuffa has provided compelling reasons to seal them.
17 Plaintiffs continue to reserve their right to challenge Zuffa’s confidentiality designations pursuant
18 to Section 6.1 of the Protective Order.

19 Zuffa and Plaintiffs (collectively, the “Parties”) have stated their positions at length
20 regarding the confidentiality and propriety of sealing the Disputed Materials, and, having met and
21 conferred on this issue, jointly move to file certain material in Plaintiffs’ Opposition conditionally
22 under seal. The Parties’ briefing states the Parties’ positions as to whether that material is
23 properly sealed, but the parties do not seek to re-litigate this issue for the purposes of these
24 filings. Thus, at this time, the parties seek to conditionally seal the Disputed Materials until the
25 Court has ruled on Parties respective motions regarding sealing.

26 The material conditionally lodged under seal in Plaintiffs’ Opposition is material or
27 descriptions of material that was conditionally lodged under seal as part of Zuffa’s Motion for
28 Summary Judgment. There is no new material that Zuffa seeks to file under seal in its Reply.

1 Should the Court determine that any of the materials filed under seal in the Motion for Summary
2 Judgment should not be sealed, Zuffa will re-file these materials on the public docket. The
3 parties therefore submit this joint motion for the Court's consideration pursuant to the Protective
4 Order for the Court's determination of whether the documents conditionally lodged under seal as
5 part of Plaintiffs' Opposition are properly filed under seal.

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Dated: August 20, 2018

Dated: August 20, 2018

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By: /s/ Stacey K. Grigsby

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ATTESTATION OF FILER

The signatories to this document are myself and Kevin Rayhill, and I have obtained Mr. Rayhill's concurrence to file this document on his behalf.

Dated: August 20, 2018

/s/ Stacey K. Grigsby

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing Joint Motion to Seal Plaintiffs' Opposition to Zuffa, LLC's Motion to Seal Zuffa, LLC's Motion for Summary Judgment (ECF No. 581) was served on August 20, 2018 via the Court's CM/ECF electronic filing system addressed to all parties on the e-service list.

/s/ Roderick Crawford

Roderick Crawford